

**FILED**

JUL 26 1999

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF ARIZONA

KEVIN E. O'BRIEN, CLERK  
UNITED STATES  
BANKRUPTCY COURT  
FOR THE DISTRICT OF ARIZONA

In Re:

AGNES KONRAD and  
JOSEPH KONRAD, h/w

v.

MARS, INC., d/b/a  
BOSTON MARKET

: Chapter 11  
:  
:  
: Case No. 98-12570 through 98-12570PHX  
:  
: CGC  
:  
: Jointly Administered  
:  
:  
: **NOTICE OF FILING MOTION FROM**  
: **THE AUTOMATIC STAY AND**  
: **REQUIREMENT TO FILE OBJECTION**  
: **BY AGNES KONRAD AND JOSEPH**  
: **KONRAD**

**NOTICE IS GIVEN** that the above Movants have filed a Motion Requesting Relief From Automatic Stay, the details of which are as follows:

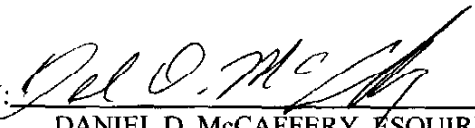
Agnes Konrad and Joseph Konrad Creditors, make application to remove the Bankruptcy Stay permitting them to go forward with a lawsuit captioned Agnes Konrad and Joseph Konrad, h/w, vs. Mid-Atlantic Restaurant Systems, Inc. , d/b/a Boston Market and it further appearing that at the time of the slip and fall the Debtors were insured with liability insurance issued by Wausau Insurance Companies and therefore, Agnes Konrad and Joseph Konrad request relief from the Stay to the extent of liability insurance provided by Wausau Insurance Companies.

**FURTHER NOTICE IS GIVEN** that pursuant to local Bankruptcy Rule 4001, if no written objection to this motion is filed with the Court and a copy served on the Movants whose address is 7848 Old York Road, Suite 200, Elkins Park, PA 19027 **WITHIN FIFTEEN (15) DAYS** of service of the Motion, the Motion for Relief of the Automatic Stay may be granted with out further hearing.

Respectfully submitted,

JAFFE, FRIEDMAN, SCHUMAN,  
SCIOLLA, NEMEROFF & APPLEBAUM, P.C.

BY:

  
DANIEL D. McCAFFERY, ESQUIRE  
Attorney for Plaintiffs